

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

BELLEAU TECHNOLOGIES, LLC,

Plaintiff,

v.

JOEALLENPRO LIMITED, a foreign
corporation; and JOE ALLEN, as an
individual,

Defendants.

Civil Action No. 18 Civ. 06319 (DLC)

JURY TRIAL DEMANDED

**NOTICE OF MOTION TO VACATE DEFAULT AND MOTION FOR LEAVE TO FILE
A RESPONSIVE MOTION OR PLEADING**

MOTION ON BEHALF OF:

Defendants JoeAllenPro Limited and Joe
Allen, by their attorneys, Meredith &
Keyhani, PLLC.

DATE, TIME AND PLACE OF HEARING:

Before the Hon. Denise L. Cote, Daniel
Patrick Moynihan United States Courthouse
500 Pearl St. New York, NY 10007-1312
at a date and time to be determined by
the Court.

SUPPORTING PAPERS:

Memorandum of law and Declaration of
Joseph Allen.

RELIEF DEMANDED:

(1) An Order granting Defendants' motion
to vacate the Clerk's Entry of Default (Dkt.
Nos. 34 and 35), (2) an order granting
Defendants' leave to file a responsive
motion or pleading, and (3) such other and
further relief this Court deems just and
proper.

Date: October 3, 2018

Respectfully submitted,

/s/ Dariush Keyhani
Dariush Keyhani

Meredith & Keyhani, PLLC
125 Park Avenue, 25th Floor
New York, New York 10017
Tel. (212) 760-0098
Fax (212) 202-3819
dkeyhani@meredithkeyhani.com
Attorneys for Defendants